

**HEARING DATE AND TIME: Apr. 8, 2010 at 9:45 a.m. (Eastern Time)**

**OBJECTION DEADLINE: Apr. 1, 2010 at 4:00 p.m. (Eastern Time)**

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*Proposed Attorneys for Movant Official Committee  
of Unsecured Creditors Holding Asbestos-Related Claims*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:
f/k/a General Motors Corp., <i>et al.</i>	:
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Chapter 11 Case No.  
09-50026 (REG)  
(Jointly Administered)

**NOTICE OF HEARING**

PLEASE TAKE NOTICE that upon the annexed application, dated March 18, 2010 (the "Application"), of the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims (the "Asbestos Claimants Committee" or "ACC"), for an order authorizing the retention and employment of Caplin & Drysdale, Chartered as Counsel to the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims *Nunc Pro Tunc* to

October 6, 2009, all as more fully set forth in the Application, a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **April 8, 2010 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections, if any, to the Application should be served on the proposed counsel for the ACC, Caplin & Drysdale, Chartered, 375 Park Avenue, 35<sup>th</sup> Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq., Trevor W. Swett, Esq., Kevin C. Maclay, Esq., and Rita C. Tobin, Esq.).

PLEASE TAKE FURTHER NOTICE that any responses or objections, if any, to the Application must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDG), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors Company, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader,

Wickersham & Taft LLP, attorneys for the United States Department of Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue, NW, Room 2312, Washington, DC 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47<sup>th</sup> Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Keuhler, Esq.); (x) the members of the ACC, until the attorneys for the ACC have been retained; (xi) if appointed, the legal representative for holders of future asbestos personal injury claims; and (xii) all entities that requested notice in these chapter 11 cases under Bankruptcy Rule 2002, so as to be received no later than **April 1, 2010 at 4:00 p.m. (Eastern Time)** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Application, the ACC may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the

Application, which order may be entered with no further notice or opportunity to be heard  
offered to any party.

Dated: New York, New York  
March 18, 2010

Respectfully submitted,

CAPLIN & DRYSDALE, CHARTERED

/s/ Elihu Inselbuch  
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